IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Number	: 09/883,509	Confirmation No.:	8697
Applicant	: Bedell, Jeffrey A		
Filed	: June 19, 2001		
Title	: Method And System For Implementing Security Filters For Reporting Systems		
TC/Art Unit	: 2131		
Examiner:	: Christopher A Revak		
Docket No.	: 53470.003026		
Customer No.	: **21967**		

REPLY BRIEF

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In response to the Examiner's Answer of June 1, 2006 Appellant respectfully requests that the Board of Patent Appeals and Interferences reconsider and withdraw the rejections of record, and allow the pending claims.

I. Status of Claims

Claims 1-18 are pending in this application. All of these claims are currently rejected.

The rejection of claims 1-18 is appealed.

II. Grounds of Rejection to be Reviewed on Appeal

The issues on appeal are whether the following rejections are proper: (1) the rejection under 35 U.S.C. § 112, second paragraph of claims 1-18, (2) the rejection under 35 U.S.C. § 102(b) of Claims 1, 7 and 13 as being anticipated by Willens, U.S. Patent 5,889,958 ("Willens"), (3) the rejection under 35 U.S.C. § 103(a) of Claims 2-4, 6, 8-10, 12, 14-16 and 18 as being unpatentable under Willens in view of Pennock et al, U.S. Patent 6,484,168 ("Pennock") and (4) the rejection under 35 U.S.C. § 103(a) of Claims 5, 11 and 17 over Willens in view of Reid et al, U.S. Patent 6,182226 ("Reid").

III. Argument

A. The Rejection Under 35 U.S.C. §112 of Claims 1-18 is improper

On Page 3 of the Examiner's Answer, Claims 1-18 were rejected under 35 U.S.C. § 112, second paragraph as being indefinite for failing to point out and distinctly claim the subject matter which the applicant regards as the invention. An on-line analytical processing system as specified in the body of Claims 1, 7 and 13 is more limiting language describing a particular embodiment of a reporting system as specified in the corresponding preambles of Claims 1, 7 and 13. The specification discloses an on-line analytical processing system as an example of one type of reporting system. ("Fig 1. and Fig 2 provide an example of a reporting system, such as an OLAP system, in accordance with the present invention." Page 5, lines 21-22; Page 1, lines 5-6, "reporting systems, such as decision support, Business Intelligence, on-line analytical processing and other systems.") *See also* MPEP § 2173.01. " A fundamental principal contained under 35 U.S.C. 112, second paragraph is that applicants are their own lexicographers. They can define in the claims what they regard as their own invention in whatever terms they choose so long as any special meaning in a term is clearly set forth in the specification."

The Examiner, in response to the Appellant's argument, asserts that "the combination of a 'reporting system' from the preamble and that claimed in the body of the claims of an 'on-line analytical processing system' as creating a disconnect between the preamble and content of the bodies of the claims whereby the terminology is inconsistently claimed." *See*, Examiner's Answer, Page 7. The Appellant respectfully disagrees. As stated above, the on-line analytical processing system specified in the body of Claims 1, 7 and 13 is more limiting language describing a particular embodiment of a reporting system as specified in the corresponding preambles of Claims 1, 7 and 13. *See,* MPEP 2173.05(e) "The mere fact that the body of a claim

recites additional elements which do not appear in the claims preamble does not render the claim indefinite under 35 U.S.C. 112, second paragraph."

In view of the above, Appellant submits that the terms "reporting system" used in the preamble of Claims 1, 7 and 13 and "on-line analytical processing system" as used in the bodies of Claims 1, 7 and 13 do not result in indefiniteness for failing to point out and distinctly claim the subject matter which the applicant regards as his invention. Accordingly, the indefiniteness rejections of claims 1-18 are improper and should be overturned.

B. The Rejection Under 35 U.S.C. § 102(B) Of Claims 1, 7 And 13 As Being Anticipated By Willens Is Improper.

The Examiner's Answer continues to repeat an essential error in this case. The Examiner alleges the network access server disclosed by Willens comprises the claimed on-line analytical processing system. The network access server disclosed by Willens (col. 1, lines 6-13; col 2, lines 50-61; col. 3, lines 16-20 & col. 9, lines 17-21) refers to user access filters as part of an access control system for controlling access to the Internet. Any analysis done by the Willens access server is limited to whether access to a particular Internet site is allowed or denied. Claim 1 "enabl[es] a user to submit a user identification input and a user request to an on-line analytical processing system" and "retrieving data associated with the on-line analytical processing system in accordance with the user request." A person of ordinary skill in the art would appreciate that submitting a "request to an on-line analytical processing system" and "retrieving data associated with the on-line analytical processing system in accordance with the user request," as recited in claims 7 and 13, are not the same as a network access filter as disclosed by Willens. The Examiner asserts that "complex computations, such as filtering take place." *See*, Examiner's Answer, Page 8. That is not correct. Such filtering does not disclose the complex analysis

inherent in an on-line analytical processing system. Willens discloses filtering as "check[ing] the local cache to see if the site is on the list stored there" (Willens, Column 5, lines 33-34) or "sending a lookup request to the network access server." (Willens, Column 5, lines 21-22). Lookups from a list do not disclose submitting a "request to an on-line analytical processing system" and "retrieving data associated with the on-line analytical processing system in accordance with the user request."

The Examiner alleges limitations are being read into the claims from the specification. This is also incorrect. In the Appeal Brief, the Appellant was using the specification to illustrate the limitations inherent in the "on-line analytical processing system" language of the claims. The functionality and corresponding limitations of an on-line analytical processing system are not anticipated by a disclosure of filtering of network addresses.

The Examiner alleges that the filtering disclosed by Willens anticipates "at least one security filter for filtering the retrieved data" wherein the retrieved "data [is] associated with the on-line analytical processing system." This argument fails for the above reasons because it depends on the previous unsuccessful assertion that Willens anticipates the use of an on-line analytical processing system as disclosed in independent claims 1, 7 and 13. A person of ordinary skill in the art would appreciate that "retrieving data associated with the on-line analytical processing system in accordance with the user request" is not disclosed by a network access server.

In view of the above, Willens does not teach or suggest submitting a "request to an on-line analytical processing system" and "retriev[ing] data associated with the on-line analytical processing system in accordance with the user request" as recited in claims 1, 7 and 13 and thus cannot be relied on to reject Claims 1, 7 and 13 under 35 U.S.C. § 102(b).

The Examiner further asserts that a notification as disclosed by Willens anticipates "a user interface for presenting the data as a report to the user." This is incorrect. The Examiner alleges that the Appeal Brief argument addressing the report element reads limitations from the specification into the claims. Again, portions of the specification were being used to illustrate the differences inherent in the claim language of a report presenting data retrieved from an on-line analytical processing system versus a notification as disclosed by Willens. A person of ordinary skill in the art would appreciate that a report which presents data retrieved by a user request to an on-line analytical processing system is not disclosed by an "application [which] notifies the user if the site she is attempting to access is not permitted." *See* Willens, Column 4, lines 63-64.

In view of the above, Willens does not teach or suggest the "presenting the data as a report to the user through the user interface" recited in Claim 1 or the similar limitations recited in claims 7 and 13 and thus cannot be relied on to reject Claims 1, 7 and 13 under 35 U.S.C. § 102(b).

For the above reasons Appellant respectfully requests that the anticipation rejection of Claims 1, 7 and 13 be overturned.

C. The Rejection Under 35 U.S.C. § 103(A) Of Claims 2-4, 6, 8-10, 12, 14-16 And 18 As Being Unpatentable Under Willens In View Of Pennock Is Improper.

The Office Action acknowledges that Willens does not disclose all the limitations as recited in the claims. For example, regarding claims 2-4, 6, 8-10 and 14-16 the Office Action acknowledges that "the teachings of Willens fails to disclose that the security filter comprises a filter expression that specifies a subset of data in the database and has a top range and bottom range attribute that specifies the highest and lowest levels of analysis for applying the security

filter." (Examiner's Answer, Page 5). As discussed in detail above, Willens fails to show the combination of claim limitations as recited in independent claims 1, 7 and 13. For example, Willens fails to disclose at least the limitations directed to an on-line analytical processing system, filtering the data retrieved from an on-line analytical processing system and presenting data as a report through an interface.

Pennock's disclosure of "a sequence of word filters [which] are used to eliminate terms in the database which do not discriminate document content" (Pennock; Column 2, lines 59-61) does not anticipate "a filter expression that specifies a subset of data in at least one database." A word filter is disclosed by Pennock as either a: "frequency filter first measures the absolute number of occurrences of each of the words in the database and eliminates those which fall outside of a predetermined upper and lower frequency range", a "topicality filter then compares the placement of each word within the database with the expected placement assuming the word was randomly distributed throughout the database" or a "overlap filter then uses second order statistics to compare the remaining words to determine words whose placement in the database are highly correlated with one and another." (Pennock; Column 3, lines 22-40). The filter as disclosed by the present application is used to filter "retrieved data" and to "specif[y] a subset of data." The filter in the present application is not directed at "analyzing and characterizing a database of electronically formatted natural language based documents wherein the output is information concerning the content and structure of the underlying database in a form that correlates the meaning of the individual documents within the database" as disclosed by Pennock. *See*, Pennock; Column 2, lines 54-59. Pennock is directed at analyzing the content of a database as a whole to create a topic set and not "filtering the retrieved data" which is "associated with the on-line analytical processing system in accordance with the user request" as

a "security filter." Thus, filtering as disclosed by Pennock is filtering a database of documents as a whole to correlate the meaning of the individual documents, not filtering retrieved data. Furthermore the filtering disclosed by Pennock is not based on expressions but on word lists. Inherent in the meaning of "expression" is a flexibility of filtering criteria that filtering based on word frequency as disclosed by Pennock does not teach or suggest. Additionally, Pennock does not disclose filtering retrieved data before it is returned to a user.

As stated above Examiner admits that Willens does not disclose the use of ranges in applying security filters. The Examiner alleges that Pennock addresses this admitted deficiency. The Appellant disagrees.

The Examiner's Answer continues to repeat another essential error in this case. The filter disclosed by the present application may be applied based on levels of analysis. "[A] top range attribute that specifies the highest level of analysis to which the security filter is applied." The filter as disclosed by Pennock does not filter based on levels of analysis, but filters using a frequency. "The frequency filter first measures the absolute number of occurrences of each of the words in the database and eliminates those which fall outside of a predetermined upper and lower frequency range." See, Pennock; Column 3, lines 22-25. The levels of analysis as disclosed by the present application is not disclosed or suggested by a frequency of occurrences as disclosed by Pennock. Furthermore, the present application describes application of filters based on the level of analysis of the data. The filters as disclosed by Pennock would not "a top range attribute that specifies a highest level of analysis" below which a subset of data could be returned. The filters as disclosed by Pennock would eliminate a word from across the entire data set if the word occurs with a frequency greater than that specified by its "range." The filtering of words based on the frequency of their occurrence does not disclose or suggest filtering "[A] top

range attribute that specifies the highest level of analysis to which the security filter is applied."

For the same reasons, Pennock does not disclose or suggest a" security filter [which] comprises a bottom range attribute that specifies a lowest level of analysis to which the security filter is applied." The filtering of words based on their frequency of occurrence does not disclose or suggest applying a security filter based on "a lowest level of analysis." The filtering disclosed in Pennock also does not specify a subset of data but eliminates a subset of data.

For at least the above reasons, the rejections of claims 2-4, 8-10 and 14-16 should be overturned.

Regarding claims 6, 12 and 18 there is no teaching or suggestion that either Willens or Pennock provide "filter that varies by user and at least one fact/metric element." Willens' filters are based on network access rules and not a "fact/metric element." The Examiner relies on Pennock to allegedly disclose a "filter expression that specifies a subset of data in at least one database." These limitations are in claims 6, 12 and 18 because of their dependencies on claims 2, 8 and 14 respectively. The Examiner then subsequently alleges that Willens discloses a filter expression wherein the filter expression and "security filter varies by user and at least one fact/metric element." If Willens is not adequate to disclose a "filter expression that specifies a subset of data in at least one database" it clearly does not disclose or suggest a filter with a filter expression wherein the "filter that varies by user and at least one fact/metric element."

For at least the above reasons Appellant respectfully requests that the obviousness rejection of Claims 2-4, 6, 8-10, 12, 14-16 and 18 be withdrawn

D. The Rejection Under 35 U.S.C. § 103(A) Of Claims 5, 11 And 17 Over Willens In View Of Reid Is Improper.

Claims 5, 11 and 17 are presently rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Willens in view of U.S. Patent No. 6,182,226 to Reid *et al* ("Reid"). Appellant respectfully disagrees.

The Office Action acknowledges that Willens does not disclose all the limitations as recited in the claims. For example, regarding Claims 5, 11 and 17 the Office Action acknowledges "[t]he teachings of Willens are silent in disclosing that the user is associated with a group of users and applying a group level security filter"(Office Action, Page 5). As discussed in detail above Willens fails to show the combination of claim limitations as recited in independent claims 1, 7 and 13. For example, Willens fails to disclose at least the limitations directed to an on-line analytical processing system, filtering the data retrieved from an on-line analytical processing system and presenting data as a report through an interface.

The Office Action alleges that Reid discloses "wherein the user is associated with a group of users wherein the security filter is a group level security filter." Appellant submits that Reid fails to make up for Willens' deficiency in this regard.

Willens does not contemplate filtering retrieved data retrieved from an on-line analytical processing system using a filter "wherein the user is associated with a group of users wherein the security filter is a group level security filter. Willens contemplates a network access filter. Reid contemplates a group level network access filter. There is no motivation to combine a Willens and Reid to provide a group level security filter for filtering data. The proposed combination would, at best, deny access to urls and network resources requested. The proposed combination does not teach or suggest filtering data [which has already been retrieved in response to a user

request] using a "group level security filter."

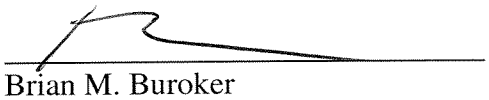
For at least the above reasons Appellant respectfully requests that the obviousness rejection of Claims 5, 11 and 17 be overturned.

IV. Conclusion

In view of the foregoing, Appellant respectfully requests that the Board reverse the prior art rejections set forth in the Action, and allow all of the pending claims.

Respectfully submitted,

July 20, 2006



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